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13 UNITED STATES BANKRUPTCY COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA

15 In Re )  
16 ) BANKRUPTCY NO. 19-04878  
17 Theresa Dalton, )  
18 ) DEBTOR'S NOTICE OF MOTION AND  
19 Debtor. ) MOTION TO AVOID LIEN UNDER  
20 ) 11USC §522(f)  
21 \_\_\_\_\_)

22 To the creditor, Becharoff Capital Corporation, by and through their attorney, Brewer &  
23 Brewer, and other interested parties:

24 1. Debtor, Theresa Dalton, commenced this case on 8-15-2019, by filing the above-  
25 numbered voluntary petition for relief under chapter 7 of title 11, United States Code.

1. This motion is filed pursuant to 11 U.S.C. § 522(f) to avoid and cancel a judicial lien  
2 held by Becharoff Capital Corporation, on the real property used as the Debtors' primary  
3 residence.

4 3. On or about January 13, 2010, Becharoff Capital Corporation, by and through their  
5 attorney Brewer & Brewer obtained a judicial lien for a non-purchase money security interest on  
6 the real property used as Debtors' residence at 318 Mason Drive, Vista, CA 92084. This judicial  
7 lien is entered of record as follows:

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9 Document Number 2010-0020774, recorded at the San Diego  
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1 County Recorder's office on January 14, 2010.  
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4. The Debtor's interest in the property referred to in the preceding paragraph and  
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encumbered by the lien does not exceed the fair market value of the property and has been  
claimed as fully exempt in her bankruptcy case.

5. The existence of Becharoff Capital Corporation's lien on Debtors' real property  
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impairs exemptions to which the Debtor would be entitled under 11 U.S.C. § 522(b).

8 WHEREFORE, Debtors pray for an Order against [creditor] for the cancellation and  
9 avoidance of the judicial liens on their residential real estate, and for such additional or  
10 alternative relief as may be just and proper.  
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Dated: 9-13-2019

Respectfully submitted,  
Law Offices of Olga Nazimova

16 By: /s/ Olga Nazimova  
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Olga Nazimova, Attorney for Debtor